

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
KNEPPER & CLARK LLC  
5510 So. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148  
Phone: (702) 856-7430  
Fax: (702) 447-8048  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

# DISTRICT OF NEVADA

STANLEY K. ANTHONY,  
Plaintiff,  
v.  
PIONEER/MAC, INC.,  
Defendant.

Case No. 2:19-cv-00044-RFB-VCF

**STIPULATION AND ORDER TO EXTEND  
THE 30(B)(6) DEPOSITION OF  
PIONEER/MAC, INC. (Second Request)**

Complaint filed: January 7, 2019

Plaintiff Stanley K. Anthory and Defendant Pioneer/Mac, Inc. (“Pioneer”) (collectively, the “Parties”), by and through their counsel of record, have agreed and stipulated to the following:

1. On April 20, 2020, the Court ordered Pioneer to provide responses by noon on April 23, 2020 for all discovery that was pending and due by March 30, 2020 [ECF Dkt. 46].

2. Thereafter, the Court permitted the Parties to conduct Pioneer's deposition before May 31, 2020. ECF No. 52,

3. During a subsequent court-ordered status conference, Pioneer was ordered to produce certain relevant discovery material on or before May 29, 2020. ECF No. 54 (minutes).

4. In order to ensure that Plaintiff has the to-be-produced documents available for the 30(b)(6) deposition, the Parties have tentatively arranged to conduct Pioneer's deposition on June

1 4, 2020, and now seek an order from the Court permitting them to conduct the deposition on that  
2 date, notwithstanding its prior orders.

3 5. This stipulation is made in good faith, is not interposed for delay, and is not filed  
4 for an improper purpose.

5 **IT IS SO STIPULATED.**

6 Dated May 26, 2020

<b>KNEPPER &amp; CLARK LLC</b>  <i>/s/ Miles N. Clark</i> Matthew I. Knepper, Esq., SBN 12796 Miles N. Clark, Esq., SBN 13848 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com  <i>Counsel for Plaintiff</i>	<b>WRIGHT FINLAY &amp; ZAK</b>  <i>/s/ Ramir M. Hernandez</i> Christopher A. J. Swift, Esq. Nevada Bar No. 11291 Ramir M. Hernandez, Esq. Nevada Bar No. 13146 Email: cswift@wrightlegal.net Email: rhernandez@wrightlegal.net  <i>Counsel for Defendant</i> <i>Pioneer Services, sued as Pioneer/Mac, Inc.</i>
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14 **ORDER GRANTING**

15 **STIPULATION TO EXTEND THE 30(B)(6) DEPOSITION OF PIONEER/MAC, INC**

16 **IT IS SO ORDERED.**

17   
18 UNITED STATES MAGISTRATE JUDGE

19 28th May

20 DATED this \_\_\_\_\_ day of \_\_\_\_\_ 2020.